

Exhibit B

**IN THE FIRST CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
TWENTIETH JUDICIAL DISTRICT**

IAN LUCAS,)
Plaintiff,) Case No. 24c2481
v.)
VANDERBILT UNIVERSITY, and)
VANDERBILT UNIVERSITY SCHOOL)
OF NURSING.)
Defendants.)

NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, on November 15, 2024, defendants Vanderbilt University and Vanderbilt University School of Nursing (together “Vanderbilt”)¹ in the above-captioned action filed a Notice of Removal (with attachments thereto) with the Clerk of the United States District Court for the District of Tennessee (Nashville). A Copy of the Notice is attached hereto as Exhibit 1 (without its respective attachments).

Respectfully submitted,

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Attorneys for the Defendant

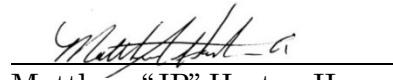
¹ Vanderbilt University School of Nursing is not a distinct entity from Defendant Vanderbilt University. Insofar as Plaintiff's decision to name Vanderbilt University School of Nursing as a separate Defendant requires the School of Nursing to join in this Notice of Removal, the School of Nursing does so.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Removal has been sent via e-mail to the following individuals on November 15, 2024:

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Elizabethtown, North Carolina
28337
ian.h.lucas@protonmail.com

Plaintiff Pro Se


Matthew "JP" Horton II